6 23 99

"To inflict cruelties on defenceless creatures, or condone such acts, is to abuse one of the cardinal tenets of a civilized society - reverence for life." - Dr. Jon Evans, England

5 3 8 2 '99 JUN 28 A10:22

Source:

URGENT ACTION ALERT FROM THE AMERICAN ANTI-VIVISECTION SOCIETY http://www.aavs.org/ (A Member of the Campaign for Responsible Transplantation)

To whom it may concern:

Food and Drug Administration (FDA) guidelines issued April 6, 1999, instituted a de facto ban on nonhuman primate xenografts because they would expose patients and the public to "significant infectious disease risk" (Docket No. 99D-0557). But the guidelines failed to address dangers with other species. Transgenic pigs are considered the source animals of choice for xenotransplants despite the existence of over 25 diseases in pigs that can infect humans. Pigs are not safer than nonhuman primates: witness swine influenza, the Porcine Endogenous Retroviruses, paramyxovirus, and the new "Nipah" virus in Malaysia that infected over 250 humans, killed 103, and led to the slaughter of some 1 million pigs. There are safer, more cost-effective, and humane alternatives to xenotransplantation that are not being explored by regulatory authorities. These include investing heavily in preventive medicine programs to reduce the need for transplants of all kinds, and increasing the pool of human organs as many European countries have done through legislative schemes. I respectfully demand that the Department of Health and Human Services ban xenotransplantation, from all nonhuman species immediately.

- 1. Xenotransplantation should be banned regardless of the species of animal being considered. Pigs are not any safer than nonhuman primates: witness swine influenza, the Porcine Endogenous Retroviruses (PERVs), the Australian paramyxovirus; a novel strain of Hepatitis E, found in US pig herds, and the new Malaysian "Nipah" virus that has devastated humans and pigs alike. (The influenza virus of 1918, which resembled a common swine flu, killed more people in modern history than any other epidemic including AIDS and the Black Plague; and PERVs, present throughout the pig genome, have infected human cells in vitro)
- 2. The FDA violated the national Environmental Policy Act by failing to perform an environmental impact statement before allowing clinical xenotransplantation experiments
- 3. Xenotransplantation is receiving substantial public (and private) financing, without adequate public debate. The FDA should not use taxpayer dollars to develop xenotransplantation without the public's consent
- 4. There are safer, more cost-effective, and humane alternatives to xenotransplantation that are not being explored by regulatory authorities. These include investing heavily in preventive medicine programs to reduce the need for transplants of all kinds, and increasing the pool of human organs as many European countries have

successfully done through legislative schemes

5. The Department of Health and Human Services should ban xenotransplantation, from all nonhuman species immediately.

Sincerely, ROBYN REICHERT BOYNTON BEACH, FLORIDA

Rober Rodas